

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

NEONODE SMARTPHONE LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD, and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Civil Action No. 6:20-cv-00507-ADA

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY
IN SUPPORT OF MOTION TO DISMISS**

Defendants Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc. (“Defendants”) file this Unopposed Motion for Extension of Time to File their Reply In Support of their Motion to Dismiss Plaintiff’s Claims of Willful Infringement as to Both Patents-in-Suit and Plaintiff’s Claims of Indirect Infringement and Direct Infringement as to U.S. Patent No. 8,812,993 (“Motion to Dismiss”). Counsel for Plaintiff indicates that Plaintiff does not oppose this motion.

The current deadline for Defendants to file their reply is October 30, 2020. The parties have met, conferred, and agreed to a seven-day extension of time up to and including November 6, 2020. The proposed extension will not impact any other currently scheduled deadlines. This request is not made for purposes of delay or for any other improper purpose.

Therefore, Defendants respectfully request a seven-day extension up to and including November 6, 2020 to file their Reply In Support of their Motion to Dismiss.

Dated: October 26, 2020

Respectfully submitted,

/s/ John M. Guaragna

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SAMSUNG ELECTRONICS
AMERICA, INC.

CERTIFICATE OF CONFERENCE

I hereby certify that the undersigned counsel for Defendants conferred with Plaintiff's counsel. Plaintiff does not oppose Defendants' request sought in this motion.

/s/ John M. Guaragna
John M. Guaragna

CERTIFICATE OF SERVICE

The undersigned certifies that on this 26th day of October 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(b)(1). Any other counsel of record will be served by a facsimile transmission and/or first class mail.

/s/ John M. Guaragna
John M. Guaragna